



**Office of the New York State
Attorney General**

**Letitia James
Attorney General**

Via ECF

May 27, 2025

Hon. Vincent L. Briccetti
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: Brooks v. Finnegan, 22 Cv. 6283 (VB)(JCM)

Dear Judge Briccetti:

This Office represents Defendants Finnegan, Wollman, and Gould, all current or former New York State Police ("NYSP") employees, in this action. As per the Court's Order (ECF No. 61), I write to update the Court on the status of settlement discussions. Since the date of the last conference, Plaintiff has made a new demand that included both monetary and non-monetary components. Plaintiff was advised that Defendants could not move forward on the requested non-monetary components. A settlement recommendation has been submitted seeking a substantial settlement amount that is currently working its way through the approval process. In addition, it is my understanding that Plaintiff is looking into creating a Special Needs Trust for the purposes of any settlement.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Jeb Harben

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cc: Joseph A. Brooks (by ECF)